

UNITED STATES DISTRICT COURT
for the
Eastern District of Michigan

United States of America
v.

Hahmad Lamont TOMLIN,

Case: 2:23-mj-30230
Case No. Assigned To : Unassigned
Assign. Date : 6/5/2023
CMP USA V TOMLIN (LH)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of May 14, 2023 in the county of Washtenaw in the
Eastern District of Michigan, the defendant(s) violated:

Code Section
18 U.S.C. § 922(g)(1)

Offense Description
Prohibited person in possession of a firearm

This criminal complaint is based on these facts:

☒ Continued on the attached sheet.



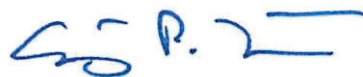
Complainant's signature

Special Agent Michael S. Parsons, (ATF)
Printed name and title

Sworn to before me and signed in my presence
and/or by reliable electronic means.

Date: June 5, 2023

City and state: Detroit, Michigan



Judge's signature

Hon. Anthony P. Patti, U.S. Magistrate Judge
Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

I, Michael S. Parsons, being duly sworn, do hereby state the following:

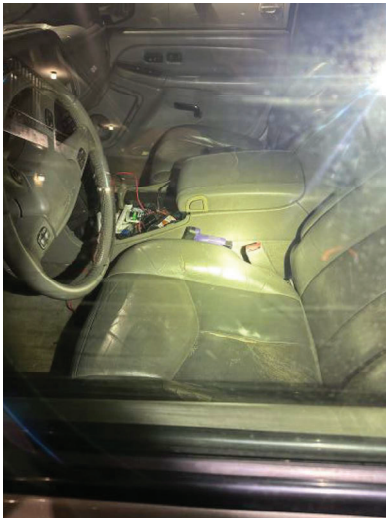
I. INTRODUCTION

1. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF). I have been a Special Agent since September of 2000. I have been involved in numerous investigations regarding firearms, firearms licensing, and narcotic laws resulting in successful federal prosecutions.

2. The statements contained in this affidavit are based on my personal knowledge, my review of written police reports by the Ann Arbor Police Department (AAPD), and information provided to me by and/or through other law enforcement agents, investigators, and individuals with knowledge of this matter. This affidavit does not provide all the information known to law enforcement about this investigation. This affidavit provides information necessary to establish probable cause that Hahmad Lamont TOMLIN (XX/XX/1978) has violated 18 U.S.C. § 922(g)(1) – Prohibited Person in Possession of a Firearm.

II. PROBABLE CAUSE

3. On May 14, 2023, AAPD Police Officer Cooper was conducting patrol at the Red Roof Inn, located in Ann Arbor, Michigan, when he observed a tan GMC SUV parked over two parking spaces, with no visible license plate. Officer Cooper exited his patrol vehicle to examine the vehicle identification number (VIN) when he observed in plain view, the rear half of a firearm protruding from the space between the driver's seat and the center console:



4. The GMC SUV was unoccupied at the time. Officer Cooper went back to his patrol vehicle and queried the vehicle VIN. The vehicle was registered to Jessica BLANSETT. Officer Cooper was familiar with BLANSETT and her boyfriend Hahman TOMLIN from a traffic stop just over a week before, in Ann Arbor, Michigan. From that

encounter, Officer Cooper knew both BLANSETT and TOMLIN were convicted felons and prohibited from possessing a firearm.

5. Officer Cooper spoke to the hotel's front desk clerk, who informed him that BLANSETT was staying in room #227. Officer Cooper established surveillance on the GMC SUV to see if anyone returned to it. Officer Cooper soon observed a black male who appeared to be Hahmad TOMLIN walking a dog near the GMC SUV. Officer Cooper conducted a Criminal History query on TOMLIN through the National Crime Information Center (NCIC) Law Enforcement Information Network (LEIN), which revealed that TOMLIN had multiple active felony arrest warrants. Officer Cooper drove his patrol vehicle back towards the parking lot and confirmed that the black male was TOMLIN.

6. Officer Cooper exited his patrol vehicle and called out to TOMLIN, who questioned what he had just said. Officer Cooper again repeated his name and told him that he was under arrest. TOMLIN began looking the opposite direction as if he were preparing to run. Officer Cooper stated loudly, "Don't run from me! Put your hands behind your back!" Immediately after hearing this, TOMLIN let go of

the dog leash and began sprinting away from Officer Cooper. Officer Cooper ran after TOMLIN while repeatedly yelling for TOMLIN to stop, which TOMLIN ignored. Eventually, TOMLIN tripped on a curb and fell, at which point AAPD Officers were able to place TOMLIN under arrest.

7. After his arrest, officers recovered from TOMLIN's person: 9mm caliber magazine, loaded with nine (9) rounds of ammunition, white folded napkin containing 13.3 grams of a white powdery crystal substance suspected of being narcotics, clear plastic baggie containing .6 grams dark gray substance suspected of being narcotics, clear plastic baggie containing 11.2 grams of white powdery substance suspected to be narcotics, and keys to the GMC SUV.

8. Shortly after TOMLIN's arrest AAPD Sergeant (Sgt.) interviewed Jessica BLANSETT outside of her hotel room. BLANSETT denied that the firearm in the GMC SUV belonged to her and gave officers permission to remove it from her vehicle. She further stated she has not driven the vehicle that day, but TOMLIN had driven it multiple times that day and had the keys to the GMC SUV.

9. During a search of the GMC SUV, AAPD Officers recovered a Taurus Arms Model: G2C, 9mm caliber pistol, with an extended magazine loaded with sixteen (16) total rounds of ammunition, one being in the chamber. AAPD Sgt. confirmed that the recovered magazine taken from TOMLIN's person functioned with the firearm recovered from the GMC SUV.

10. A criminal history check conducted on TOMLIN revealed that he is currently on probation and has been convicted of the following felonies:

- a. On September 02, 2008, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW080000696) to one count of Weapons-Carrying Concealed.
- b. On February 02, 2010, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW090001177) to one count of Controlled Substance-DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 50 Grams and one count of Controlled Substance-DEL/MFG Marijuana/Synthetic Equivalents.
- c. On February 02, 2010, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW090001825) to two counts of Police Officer – Assaulting/Resisting/Obstructing.
- d. On February 10, 2010, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW090001270) to one count of Controlled Substance-

DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams.

- e. On June 28, 2011, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW100000850) to two counts of Controlled Substance-DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams.
- f. On June 28, 2011, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW100000797) to two counts of Controlled Substance-DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams.
- g. On June 28, 2011, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW110000922) to two counts of Police Officer – Assaulting/Resisting/Obstructing.
- h. On June 28, 2011, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW100000352) to one count of Controlled Substance-DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams.
- i. On June 29, 2011, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW100000787) to three counts of Controlled Substance-DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams.
- j. On May 20, 2014, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW131908-FH) to two counts of Controlled Substance-DEL/MFG (Cocaine, Heroin or Another Narcotic) Less Than 25 Grams.
- k. On May 20, 2014, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: CRW140000165) to one count of Operating – While Intoxicated/Impaired – 3rd Offense Notice and one count of Police Officer – Assaulting/Resisting/Obstructing.

- l. On February 20, 2018, TOMLIN plead guilty in Washtenaw County 22nd Circuit Court (CFN: 17000694FH) to one count of Operating – While Intoxicated/Impaired – 3rd Offense Notice.
- m. On September 07, 2021, TOMLIN plead Nolo Contendere in Washtenaw County 22nd Circuit Court (CFN: 19000527FH) to one count of Assault with Intent to do Great Bodily Harm Less than Murder or by Strangulation.
- n. On September 07, 2021, TOMLIN plead Nolo Contendere in Washtenaw County 22nd Circuit Court (CFN: 19000550FH) to one count of Operating – While Intoxicated/Impaired – 3rd Offense Notice.

11. On May 25, 2023, Affiant received TOMLIN's Michigan Department of Corrections (MDOC) Prisoner Pre-Release Notice. Within this MDOC Prisoner Pre-Release Notice, TOMLIN acknowledges with his signature that he is a convicted felon and therefore prohibited from "use, brandish, display, carry or otherwise possess a firearm..."

12. Affiant is an expert in the Interstate Nexus of Firearms. The Taurus Arms Model: G2C, 9mm caliber pistol, recovered from TOMLIN, was manufactured outside the State of Michigan, thereby travelling in interstate commerce.

III. CONCLUSION

13. Probable cause exists that Hahmad Lamont TOMLIN, in Washtenaw County, located in the Eastern District of Michigan, knowingly possessed the above-described firearm: said firearm having traveled in interstate commerce; in violation of 18 U.S.C. § 922(g)(1) – Prohibited Person in Possession of a Firearm.

Respectfully submitted,



Michael S. Parsons
Special Agent, A.T.F.

Sworn to before and signed in my presence
and/or by reliable electronic means.



HON. ANTHONY P. PATTI June 5, 2023
UNITED STATES MAGISTRATE JUDGE